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EDMUND G. BROWN JR.
GOVERNOR

January 20, 2017

Philip L. Browning, Director
Los Angeles County Department
of Children and Family Services
425 Shatto Place, Room 600
Los Angeles, CA 90020

Dear Mr. Browning:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of August 22, 2016 to August 26, 2016. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Jaime Urquizo at (916) 654-2101. You may also contact him by e-mail at james.urquizo@dss.ca.gov.

Sincerely,

Original signed by Jim Tashima

JAMES TASHIMA, Chief
Civil Rights Unit
Welfare to Work Division

Enclosure

c: Lynne Bowles Condon, Civil Rights Coordinator

Kim McCoy Wade, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
LOS ANGELES DEPARTMENT OF CHILDREN
AND FAMILY SERVICES
Conducted on
August 22, 2016 to August 26, 2016**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
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Reviewer: Jaime Urquizo

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Los Angeles County Department of Children and Family Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on August 22, 2016 to August 26, 2016. An exit interview was held on August 26, 2016, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Vermont	8300 S Vermont, Los Angeles, CA	Children Services	English, Spanish
Compton	921 E. Compton Blvd, Los Angeles, CA	Children Services	English, Spanish
Eastern	5835 S. Eastern, Commerce, CA	Children Services	English, Spanish
Los Angeles	1933 S. Broadway, Los Angeles, CA	Children Services	English, Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2016 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups.

In this review the following organization(s) were contacted for feedback.

- Family Focus Resource and Empowerment Center
(Antelope Valley Branch)
43210 Gingham Ave.
Lancaster, CA 93535
- Child Care Resource Center (CCRC)
250 Grand Cypress Ave.
Palmdale, CA 93551
- NOTE: These organizations did not provide any observations.

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Children Social Workers	32	30
Receptionist/Screeners	8	6
Total	40	36

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

Languages of clients' cases (English, Spanish)	Emergency Response	Children Services	TOTAL
English speakers' case files reviewed	5	6	11
Non-English or limited-English speakers' case files reviewed (Spanish)	27	33	60

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section X highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XI of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	yes			
Does the county have extended hours to accommodate clients?	yes			
Can applicants access services when they cannot go to the office?	yes			
Does the county ensure the awareness of available services for individuals in remote areas?	yes			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	yes			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Is the pamphlet distributed and explained to each client at intake and re-certification?	yes			
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukranian, Vietnamese?	yes			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	yes			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	yes			
Were the current versions of the required posters present in the lobbies?	yes			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	yes			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	yes			

B. Corrective Actions**None****C. Recommendations****None****IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: Monday – 8300 South Vermont, Los Angeles, CA

Facility Element	Findings	Corrective Action
Parking	All Disabled Parking lot lines are in need of repainting	<p>The parking space shall be marked with an International Symbol of Accessibility...in white on a blue background - a minimum 36" wide x 36" high.</p> <p>(CA T24 11B-502.6.4.1) pg. 169</p> <p>The parking space shall be marked with an International Symbol of Accessibility ...in white or a suitable contrasting color</p> <p>(CA T24 11B-502.6.4.2) pg. 169</p> <p>The centerline of the International Symbol of Accessibility shall be a max. of 6" from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length.</p> <p>(CA T24 11B-502.6.4.2) pg. 169</p>
Directional signage to accessible entrance if not main entrance?	There is no directional sign in the hallway leading clients to the DCFS lobby. There are other offices in the lobby.	Directional signs complying with "Visual Characters" heading in Section 57, Signs & Identification), including the International Symbol of Accessibility complying with

		<p>“International Symbol of Accessibility” heading in Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6) pg. 28</p> <p>Visual characters shall be 40” min. above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) pg. 376</p>
Accessible signage	Department of Children and Family Services sign at lobby door is not in threshold language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40” max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Accessible signage	In Lobby: “NOTICE: All DCFS Visitors Please Announce Your presence to the Receptionist” is not in Threshold Language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that</p>

		<p>applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
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2. Facility Location: Tuesday – 921 E. Compton Blvd., Los Angeles, CA

Facility Element	Findings	Corrective Action
Is there unauthorized parking signage at entrance to off-street accessible parking?	Appropriate wording at entry to parking lot is missing.	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____"</p>

		<p>_____.” (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 170</p>
Accessible signage	Signs at entrance to the building: “ATTENTION NO SMOKING within 20 feet of main Entrance, Exits and Operable Windows. Thank you” are not in Threshold Language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40” max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Accessible signage	SIGN: “Weapons Drugs Alcohol are prohibited on the Property” -- Are not in Threshold Language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40” max. Please see Table 57-5.</p>

		(CA T24 11B-703.5) (ADA 703.5) pg. 379
Accessible signage	SIGN: "EMERGENCY EXIT ONLY Upon Fire Alarm Wait 20 Seconds" – Is not in Threshold Language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>

3. Facility Location: Wednesday – 5835 S. Eastern, Commerce, CA

Parking	Four (4) Disabled Parking signs are short at 49" height.	<p>Parking identification signs shall be reflectorized with a min. area of 70 square inches. (CA T24 11B-502.6.1) pg. 169</p> <p>Signs shall be 60" min. above the finish floor or ground surface measured to the bottom of the sign. (CA T24 11B-502.6) (ADA 502.6) pg. 169</p> <p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250". (CA T24 11B-502.6.2)</p>
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Parking	Four (4) Parking spots unsafe with no access aisles connected to the path of travel into the main building.	<p>The parking access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) pg. 176</p> <p>Access aisles for van parking spaces shall be located on the passenger side of the parking spaces. (CA T24 11B-502.3.4) (ADA 502.3.4) pg. 176</p> <p>Access aisles shall not overlap the vehicular way. (CA T24 11B-502.3.4) (ADA 502.3.4) pg. 176</p>

4. Facility Location: Thursday – 1933 S Broadway, Los Angeles, CA

No discrepancies seen at this building.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other

means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	yes			
Does the county use a primary language form?	yes			
Does the client self-declare on this form?	yes			
Are non-English- or limited- English-speaking clients provided bilingual services?	yes			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	yes			
Is there a delay in providing services?		no		
Does the county have a language line provider, a county interpreter list, or any other interpreter	yes			

Question	Yes	No	Some-times	Comments
process?				
Are county interpreters determined to be competent?	yes			
Does the county have adequate interpreter services?	yes			
Does the county allow minors to be interpreters? If so, under what circumstances?		no		LA County has policy in place for minors <u>not to be</u> interpreters for their parents.
Does the county allow the client to provide his or her own interpreter?	yes			The County will allow and documentation is evident.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	yes			
Does the county use the CDSS-translated forms in the clients' primary languages?	yes			
Is the information that is to be inserted into NOA translated into the client's primary language?	yes			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual	yes			

Question	Yes	No	Some-times	Comments
skills, including Braille material, taped text, large print materials (besides the Pub 13)?				
Does the county identify a client with a disability (physical, mental, or learning)?	yes			
Does the county provide reasonable accommodations to clients with a disability (physical, mental, or learning)?	yes			
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	yes			
Does the county offer screening for learning disabilities?	yes			
Is there an established process for offering screening?	yes			
Is the client identified as having a learning disability referred for evaluation?	yes			

B. Corrective Actions
None

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Emergency Response	Children Services
Ethnic origin documentation	The Los Angeles County Department of Children and Family Services is clearly identifying client Ethnicity on record	The Los Angeles County Department of Children and Family Services is clearly identifying client Ethnicity on record
Primary language documentation	The Los Angeles County Department of Children and Family Services is clearly identifying a client's Primary Language on record	The Los Angeles County Department of Children and Family Services is clearly identifying a client's Primary Language on record
Method of providing bilingual services and documentation	At intake clients are queried on language preferences and assigned a bilingual worker.	At intake clients are queried on language preferences and assigned a bilingual worker.
Client provided own interpreter	A client is advised on the usage of client provided interpreter and it is documented.	A client is advised on the usage of client provided interpreter and it is documented.
Method to inform client of potential problem using own interpreter	As a client is processed at intake they are advise as to the potential problems with the proving their own interpreter and its documented.	As a client is processed at intake they are advise as to the potential problems with the proving their own interpreter and its documented.

Documented Item	Emergency Response	Children Services
Individual's acceptance or refusal of written material offered in primary language	When a client refuses written material offered in their language – it is documented.	When a client refuses written material offered in their language – it is documented.
Documentation of minor used as interpreter	If a minor is used as an interpreter – it is being documented.	If a minor is used as an interpreter – it is being documented.
Documentation of circumstances for using minor interpreter temporarily	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.
Method of identifying client's disability	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a client's disability.	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a client's disability.

B. Corrective Actions
None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	yes			
Do employees understand	yes			

the county policy regarding a client's rights and procedure to file a discrimination complaint?				
Does the county provide employees Cultural Awareness Training?	yes			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	yes			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	yes			

A. Corrective Actions
None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	yes			

Interview and review areas	Yes	No	Some-times	Findings
Did the employees know who the Civil Rights Coordinator is?	yes			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	yes			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	yes			
Is the County utilizing correct correspondence to address the final results to the complainant after the investigation is completed?	yes			

C. Corrective Action:

None

IX. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups.

No observations were submitted by the community organizations that were contacted.

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Los Angeles County Department of Children and Family Services Civil Rights Compliance Plan for the period September 1, 2016 to August 31, 2017, was received on December 10, 2016. It is approved as submitted.

XI. CONCLUSION

The CDSS reviewer found the Los Angeles County Department of Children and Family Services staff warm, welcoming, informative and very supportive. Thanks to Lynne Boyles Condon, Civil Rights Coordinator and Lynette Morgan-Nichols and Kori Neal for organizing the details of the review. Each District Office, staff was helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Los Angeles County Department of Children and Family Services is in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Los Angeles County Department of Children and Family Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.